

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical, and it is presented here exactly as submitted.



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February 5, 1999

Via Facsimile

Mr. Robert C. McNally, Chief (MC-7508W)
Special Review Branch
Special Review and Reregistration Division
United States Environmental
Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Re: Preliminary Risk Assessment for Dichlorvos

Dear Bob:

This letter confirms the various discussions that Amvac representatives have had with EPA staff members earlier today and yesterday concerning EPA's response to my January 13, 1999, letter. My letter stated Amvac's concern that it had not received all materials referenced in EPA's Preliminary Risk Assessment for Dichlorvos (DDVP Risk Assessment) and for this reason requested additional time within which to provide comments on the DDVP Risk Assessment. Specifically, Amvac requested an extension of 30 days from the date that all information on which the DDVP Risk Assessment was based was made available. Without that information, Amvac cannot meaningfully respond to EPA's request for comment.

Since sending that letter, Amvac has received some, but not all, of the information referenced in the DDVP Risk Assessment. I understand that EPA will provide the additional references to Amvac. To assist EPA in this regard, I have appended a list of the references that Amvac does not now have. I note, however, that additional references may be necessary because Amvac has discovered, in the course of reviewing the documents it has received, that many of the listed references rely on EPA documents that are not themselves included on the reference list and that Amvac does not have. It is essential that Amvac be able to review these documents to provide adequate comments on the DDVP Risk Assessment. Amvac thus will supplement the appended list with these other documents as soon as it receives and reviews the documents on the appended list.

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Amvac renews its request for an extension of 30 days from the date on which it receives all relevant documents in which to submit its comments on the DDVP Risk Assessment. EPA cannot lawfully release the DDVP Risk Assessment to the public -- in any form -- without first allowing Amvac a 30-day opportunity to comment on all information underlying the DDVP Risk Assessment.

Thank you for your assistance.

Sincerely,



Ian S. Chart

Attachment

cc: Marcia E. Mulkey, Esquire (w/attachment) (via facsimile)
Ms. Pam Noyes (w/attachment) (via facsimile)

Blondell, J. and Spann, M. (1998). "Review of DDVP Incidence Reports." DP Barcode D242971. Chemical # 084001. Reregistration Case # 0310 (Mar. 31, 1998).

Dannan, G. (1998). "Toxicology Review for Reregistration Eligibility Document on Dichlorvos (DDVP)" (Feb. 20, 1998).

Ghali, G. (1997). "Dichlorvos (DDVP): Hazard Identification Committee Report" (Dec. 19, 1997).

Hummel, S. (1998a). "Dichlorvos (0804001) Special Review: Response to PD 2/3 and Anticipated Residues for Dichlorvos Resulting from the Use of Dichlorvos, Naled, and Trichlorfon" (Apr. 9, 1998).

Hummel, S. (1998b). "Dichlorvos (084001). Anticipated Residues for Dichlorvos Resulting From Use of Dichlorvos and Naled" (June 15, 1998).

Jaeger, R. (1989). Transmittal of the Final FIFRA Science Advisory Panel Report on the September 28-29 Meeting. Memo to D. Campt (Oct. 16, 1989).

Kent, R. (1998). Personal Communication (e-mail) to C. Scheltema. DDVP-Application of Inhalation Endpoint (Nov. 20, 1998).

Lewis, P. (1998). Transmittal of the Final Report of the FIFRA Scientific Advisory Panel Meeting Held July 29-30, 1998. Memorandum to M. Mulkey, Director, Office of Pesticide Programs.

Rowland, J. (1998). "DICHLORVOS (DDVP) - RE-EVALUATION - Report of the Hazard Identification Assessment Review Committee" (June 3, 1998).

Sahib, I. (1998). "Drinking Water Assessment for DDVP" (Mar. 25, 1998).

Sette, W.F. (1998). "DDVP (084001): Pathology Working Group Peer Review of 28 Day Neurotoxicity Study" (Apr. 9, 1998).

Sette, W.F. (1998). "DDVP (084001). Trichlorfon (057901). D237270: Summary Review of Published Studies on Metrifonate, a Drug Metabolized to DDVP, and Their Relevance to DDVP Risk Assessment" (MRID 44308001) (Apr. 10, 1998).

Stewart, J. (1998). "Review of Toxicity Studies on DDVP Using Human Volunteers." MRIDs 44317901, 4416201, 44248801, 44248802 (Mar. 24, 1998).

Stewart, J. (1996a). "Dichlorvos Special Studies." MRID 42880101, 42881101 (May 30, 1996).

Stewart, J. (1996b). "Review of Supplementary Pathology Data: Staging of Severity of Mononuclear Cell Leukemia Observed in Male Fisher 344 Rats in the Two Year Carcinogenicity Study." MRID 43565601 (June 20, 1996).

Stewart, J. (1996). "DDVP Transmittal of the Quantitative Risk Assessment and Response to Registrant's Questions Concerning Neurotoxicity Study and Cancer Peer Review" (Oct. 4, 1996).

Stewart and Burnam (1996). "Fifth Carcinogenicity Peer Review of Dichlorvos." Tox Chem #328. PC Code 084001 (Aug. 28, 1996).

Stewart, J. (1997). "Toxicology Branch Response to Public Comments on the PD 2/3 for Dichlorvos" (Apr. 16, 1997).

Tarplee, B. and Rowland, J. (1998). "Dichlorvos (DDVP) - Report of the FQPA Safety Factor Committee" (June 2, 1998).

* We would also like the list mentioned on page 30 (last paragraph) of the Preliminary Risk Assessment for Dichlorvos. "Therefore, the Agency has developed a list of commodities likely to be treated with DDVP that are covered by tolerances and/or Food Additive Regulations."

[Refer to 4/9/98 PD 2/3 response
authored by Susan Hummel.]